

**RICHARD L. BREITMAN**  
ATTORNEY AT LAW  
*Practicing Immigration and Nationality Law*

2901 Metro Drive Suite 501  
Bloomington, Minnesota 55425  
(612) 822-4724

FAX (952) 854-8519

breitman@ix.netcom.com

February 6, 2013

✓ Deputy Chief Counsel, Commercial & Administrative Law Div (Original) FedEx 87443771  
ICE Office of Principal Legal Advisor  
US Dept of Homeland Security  
425 I Street NW, Room 6100  
Washington, DC 20536

Office of General Counsel (Copy) By U.S. Post  
U.S. Department of Homeland Security  
Washington, DC 20258

Office of the Chief Counsel (Copy) Hand Delivered  
U.S. Immigration & Customs Enforcement  
2901 Metro Drive #100  
Bloomington, MN 55425

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LEGAL OFFICE



**RE: Notification of Incident and Claim for Damages Under the Federal Tort Claims Act  
In the Matter of Adijat Edwards**

Dear: Counsel

I represent Adijat Edwards in her claim as a result of property taken and retained by officers of Immigration & Customs Enforcement (ICE) on or about February 8, 2011.

I attach an authorization signed by Adijat Edwards authorizing me to make this claim on her behalf for theft of property by Immigration & Customs Enforcement (ICE) Officers.

2. Claimant's Representative:  
Richard Breitman  
2901 Metro Dr. #501  
Bloomington, MN 55425  
(612) 616-3438

6. The date of events resulting in the conversion of property, cash and jewelry is February 8, 2011. It occurred at the offices of ICE in Bloomington, Minnesota at 7800 Metro Parkway, 2901 Metro Drive, and at the Minneapolis, St. Paul International Airport.

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CIS COUNSEL

**EXHIBIT A**

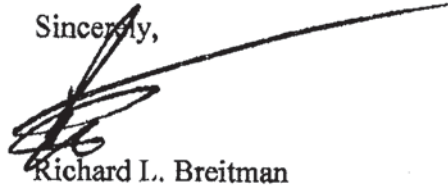
- 8-9. Adijat Edwards landed in the U.S. from Nigeria on 1/31/2011 at the Minneapolis St. Paul International Airport and was held in custody of US Customs and Border Patrol (USCBP) and US Immigration & Customs Enforcement (USICE) who took from her all her possessions, including about \$4,000.00 in jewelry. On morning of February 8, 2011, ICE Officer Ken Last Name believed to be Olson, whose cell phone number was and remains as of 12/18/2012 612-290-0691, took Adijat Edwards to the US Bank at Minneapolis St. Paul International Airport and had her withdraw \$1,200.00 in cash by using her bank card, stating that it was necessary to purchase a ticket to be used to expedite remove Adijat Edwards from the United States. Officer Adam Last Name Unknown accompanied them to the US Bank. Ice Officer Ken and Adijat Edwards then went to the Delta airline ticket counter at the airport and Office Ken asked to purchase a ticket whereupon the agent advised him that no ticket was necessary for someone being expedited removed from the United States. Office Ken retained the \$1,200.00 in cash. Adijat Edwards asked for the money and Officer Ken said the money would be returned just before she would be removed from the US. Adijat Edwards was returned to the ICE building in the Metro Office Park. In the early afternoon of February 8, 2011, another Officer named Zanter or Vanter took Adijat Edwards to the airport. She asked about the return of her jewelry and the \$1,200.00 in cash and the Officer said he did not know anything about that. Neither the \$1,200.00 nor the jewelry were returned to Adijat Edwards.

Adijat Edwards is the claimant and her address for these purposes is c/o Richard Breitman, 2901 Metro Drive, Suite 501, Bloomington, MN 55425.

11. Witnesses: The above named three officers Ken, Adam, and Zanter/Vanter know what occurred. An investigation was conducted by Gerardo Guzman of the Department of Homeland Security Chicago Field Office of The Inspector General. He can be reached at (312) 886-0129; [Gerardo.Guzman1@dhs.gov](mailto:Gerardo.Guzman1@dhs.gov).
12. Property Damage in this matter involves the theft of \$1,200.00 in cash and jewelry valued at approximately \$4,000.00.
- 15-19 Adijat Edwards did not carry insurance responsive to the requests on SF 95.

Please direct any communication to Richard Breitman, the undersigned, regarding this matter.

Sincerely,



Richard L. Breitman

RLB:sf